September 6, 2016

Mr. Andrew M. Slavitt
Acting Administrator
Centers for Medicare & Medicaid Services

Mr. B. Vindell Washington
National Coordinator for Health Information Technology
Department of Health and Human Services

Re: Accreditation and Test Tools for EHR Modules

Dear Mr. Slavitt and Mr. Washington:

The Premier healthcare alliance, a 2006 Malcolm Baldrige National Quality Award recipient, maintains the nation's most comprehensive repository of hospital clinical, financial and operational information, operates one of the leading healthcare purchasing networks and supports quality measurement and reporting for a variety of settings and systems. In serving our membership of approximately 3,600 leading hospitals and health systems and 120,000 other providers, including some of the nation's largest physician practices, we believe it is critical to get performance measurement reporting correct. This is particularly important as the country shifts to value-based purchasing and alternative payment models based on clinical quality performance measures.

Ensuring that accurate performance information is used for payment purposes is why we have elected to be the first in the country to hold ourselves to the higher standard of NCQA's eCQM Certification Program. Having been certified by the NCQA certification and the Meaningful Use (MU) electronic health record technologies (CEHRT), we can confidently state that the NCQA testing program is a much more robust and rigorous validation process, instilling greater confidence that our measures are correctly being calculated.

Although the NCQA program is considerably more robust and rigorous, we found its certification program easier to use, and in some cases easier to conduct testing, than the current method via the MU CEHRT/Project Cypress tool for the following reasons:

1. Use of industry-standard messaging formats (CCD/QRDA),
2. Multiple test decks per measure with automated test results,
3. Web-based interface to conduct testing, and
4. Streamlined validation of any discrepancies found.

Accordingly, we strongly encourage your approval of this testing platform, under ONC's and NVLAP's authority to approve test tools and test procedures for EHRs and EHR modules (§ 170.523), and welcome further discussions on how we may be of assistance to support your approval process.

Sincerely,

Blair Childs
Senior vice president, Public Affairs
Premier healthcare alliance